

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

MIDLAND FUNDING LLC

Plaintiff,

vs.

ANDREA L. BRENT

Defendant and Third-Party Plaintiff

vs.

**MIDLAND CREDIT MANAGEMENT,
INC.**

Third-Party Defendant

Case No. 3:08-CV-1434

Judge David A. Katz

**DEFENDANT/THIRD-PARTY
PLAINTIFF'S PRELIMINARY ESTIMATE
OF FEES AND EXPENSES**

Below is Defendant/Third-Party Plaintiff's preliminary estimate for the amount of fees and expenses anticipated in this litigation. This estimate is submitted pursuant to the Court's directive to be exchanged at or prior to the Case Management Conference on August 6, 2008 at 9:30 a.m. The following are based upon estimates as to time and expenses to be devoted to this matter.

ATTORNEY FEES

Preliminary Investigation &	
Filing Complaint	\$ 3,500.00
Procedural Motions Practice	2,000.00
Discovery	5,000.00
Class Certification	5,000.00
Dispositive Motions Practice	7,500.00
Settlement Negotiations	2,000.00
Trial and Preparation	<u>20,000.00</u>

TOTAL FEES **\$ 45,000.00**

COSTS

Depositions	\$ 3,000.00
Experts	-0-
Witness Fees	-0-
Travel	3,000.00
Other	<u>1,500.00</u>

TOTAL COSTS **\$ 7,500.00**

Respectfully submitted,

/s/Dennis E. Murray, Sr.

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Attorneys for Defendant/Third-Party Plaintiff

CERTIFICATION

This is to certify that a copy of the foregoing **Preliminary Estimate of Fees and Expenses** was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic system. Parties may access the filing through the Court's system on this 29th day of July, 2008.

Respectfully submitted,

/s/Dennis E. Murray, Sr.

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